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6 Attorneys for Defendant:
BAO PHUNG

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9 IN THE UNITED STATES DISTRICT COURT
10 FOR THE NORTHERN DISTRICT OF CALIFORNIA
11
12 SAN FRANCISCO DIVISION

13 **UNITED STATES OF AMERICA,**) Case No. CR 11-00097 CRB
14 Plaintiff,)
15 vs.)
16)
17)
18 **BAO PHUNG,**)
19 Defendant.)
20

**STIPULATION AND [PROPOSED] ORDER
TO MODIFY PRETRIAL RELEASE
CONDITIONS**

21 It is hereby Stipulated by the parties in the above-captioned matter that
22 defendant herein, Bao Phung, be allowed to modify his pretrial release
23 conditions as follows:

25 Mr. Phung be allowed to travel to locations outside of the Northern District
26 of California in order to fulfill his duties as an employee of Thanh Hoang Moving
27 Services and also to extend his restriction time to the time that he returns

1 home from the particular moving job, within the same day, to be approved by
2 Pre-Trial Services.

3 Mr. Anthony R. Granados, the Pretrial Services Officer assigned to this
4 matter, stated that he has no objection to the conditions being modified to
5 allow Mr. Phung to work for Thanh Hoang Moving Services.

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7
8 Date: July 18, 2011 By: _____/s/
9 Jeffry Glenn (SBN. #47357)
10 BERMAN, GLENN & HAIGHT
11 Attorney for Defendant,
Bao Phung

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13 Date: July 18, 2011 By: _____/s/
14 Robert Rees
15 Assistant United States Attorney

1
2 **ORDER**
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4 By Stipulation of the parties,

5 IT IS HEREBY ORDERED that defendant Bao Phung's pretrial release
6 conditions be modified to allow him to work for Thanh Hoang Moving Services,
7 to travel outside the Northern District for work and to extend his restriction time to
8 return home from work at a time approved by Pre-Trial Services.

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10 Date: July 20, 2011

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12 By: _____
13 The Hon. Joseph C. Spero
14 United States Magistrate Judge
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